UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LEWIS S. CLARK and PATRICIA E. CLARK, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

BARRICK GOLD CORPORATION, AARON W. REGENT, JAMIE C. SOKALSKY, and AMMAR AL-JOUNDI,

Defendants.

CLEMENT BERNARD, Individually and on Behalf of All Others Similarly Situated

Plaintiff,

v.

BARRICK GOLD CORPORATION, AARON W. REGENT, JAMIE C. SOKALSKY, and AMMAR AL-JOUNDI,

Defendants.

CIVIL ACTION NO. 1:13-cv-03851-RPP

CIVIL ACTION NO. 1:13-cv-04123-RPP

MOTION OF THE INSTITUTIONAL INVESTOR GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF CLASS COUNSEL

PLEASE TAKE NOTICE that on a date and at a time designated by the Court, before the Honorable Robert P. Patterson, at the United States District Court for the Southern District of New York, located at the United States Courthouse, 500 Pearl Street, Courtroom 24A, New York, New York, the Institutional Investor Group, comprised of the International Painters and

Allied Trades Industry Pension Fund, the Rhondda Cynon Taf Pension Fund, and the Pension Fund and Treasury of Surrey, by its undersigned attorneys, will respectfully move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by Section 101(a) of the Private Securities Litigation Reform Act of 1995, Pub. L. 104-67, 109 Stat. 737 (the "PSLRA"), for entry of an Order:

- (1) Consolidating the above-captioned actions, as well as any other related actions pending in this Court and any subsequently filed or transferred actions, pursuant to Rule 42(a) of the Federal Rules of Civil Procedure;
- (2) Appointing the Institutional Investor Group as lead plaintiff in this action; and
- (3) Approving the Institutional Investor Group's selection of counsel, the law firm of Barrack, Rodos & Bacine, as class counsel in this action.

WHEREFORE, in support of this motion, the Institutional Investor Group will rely upon the accompanying memorandum of law, the declaration of Jeffrey A. Barrack, the pleadings filed in this case, and such other written or oral argument as may be presented to the Court.

Dated: August 5, 2013

Respectfully submitted,

BARRACK, RODOS & BACINE

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-and-

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